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CHIEF CLERK'S OFFICE

Southwest Central Emergency Telephone	)	
System Board	)	
	)	
vs.	)	05-0055
	)	
DuPage County Emergency Telephone System	)	
Board	)	
	)	
Dispute regarding U.S. Postal Zip Codes 60514	)	
and 60527 pursuant to the Wireless Emergency	)	
Telephone Safety Act (50 ILCS 751)	)	

**MOTION IN LIMINE**

Now comes Southwest Central 9-1-1 System Emergency Telephone System Board ("SWC911 ETSB"), by its attorney, RONALD F. NEVILLE, and requests the Administrative Law Judge, Judge Terrance A. Hilliard, to enter an order in limine and instruct DuPage County Emergency Telephone System Board ("DuPage ETSB") and its attorneys not to argue or question any witnesses regarding the following:

1. On June 24, 2005, DuPage ETSB filed a pleading entitled "DuPage County Emergency Telephone System Board's Position Statement" with the Illinois Department of Central Management Services ("DuPage ETSB Position Statement").

2. Exhibit B of the DuPage ETSB Position Statement constitutes hearsay and is inadmissible. 83 Illinois Administrative Code, Section 200.630.

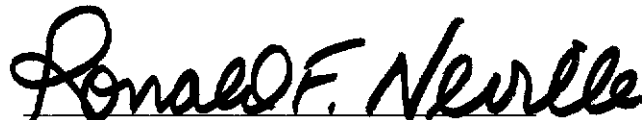
3. Exhibit C (Shared Zip Code Intergovernmental Agreement) is a document prepared by DuPage ETSB but never agreed to or executed by SWC911 ETSB. Accordingly, the provisions of the document are irrelevant.

4. On June 9, 2005, DuPage ETSB filed with the Clerk of the Illinois Commerce Commission a document entitled "DuPage County Emergency Telephone System Board's Proposed Statement and Stipulation of Certain Facts."

5. Section II of the aforesaid pleading is named "Proposed Stipulated Facts," but SWC911 ETSB has never agreed to stipulate to all the facts set forth in that section, and thus DuPage ETSB is not entitled to argue the existence of the "facts" contained in Section II to which SWC911 ETSB objects, and the Administrative Law Judge is not permitted to consider those proposed stipulations as evidence at the hearing. Attached hereto as Exhibit 1 is attorney Ronald F. Neville's ("Neville") letter to attorney Patrick K. Bond ("Bond") dated July 28, 2005, which outlines SWC911 ETSB's objections to each paragraph of Section II. SWC911 ETSB renews and adopts those objections as part of this motion in limine. Since July 28, 2005, Neville and Bond have discussed DuPage ETSB's proposed stipulation, and Bond has repeatedly indicated he would forward amended proposed stipulations to Neville for his and his client's consideration, but he has not to date delivered those amended stipulations to Neville.

Wherefore, SWC911 ETSB respectfully requests the Administrative Law Judge grant SWC911 ETSB's motion in limine.

Respectfully submitted,

A handwritten signature in black ink that reads "Ronald F. Neville". The signature is written in a cursive, flowing style.

Ronald F. Neville  
Attorney for SWC911 ETSB

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